



U.S. Department of Justice

United States Attorney  
Eastern District of New York

MKP/TH/KMT

271 Cadman Plaza East  
Brooklyn, New York 11201

January 22, 2019

By Hand and ECF

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.  
Criminal Docket No. 18-204 (S-1) (NGG) (VMS)

Dear Judge Garaufis:

Pursuant to Rule IV(C) of the Court's Individual Rules, the government respectfully requests permission to file an oversized memorandum of law in opposition to Clare Bronfman's motion to suppress (DEs 271-273), and Keith Raniere's motion to suppress and for a Franks hearing (DE 269). The defendants' briefing in support of these motions, including attorney affirmations, totals 48 pages. The government requests permission to file a single brief, consisting of no more than 50 pages, in opposition to these two motions.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
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Tanya Hajjar  
Kevin Trowel  
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cc: Counsel of record (by ECF)  
Clerk of Court (NGG) (by ECF)

*Application granted.*  
*to order.*  
s/Nicholas G. Garaufis

*1/22/19*